

Liberty Tax has been offered to come and pick up those files. The Plaintiff has other offices in the area, so it would be easy for them to pick them up.

Defendant is disabled and can not lift the boxes to be shipped.

Defendant is on the verge of bankruptcy because of Liberty Tax and can not afford to spend hundreds of dollars to mail the boxes to Liberty, that they will destroy as they have electronic copies of everything.

Liberty Tax previously left 5+ years of files from 4 offices in the 31st St. Corporate office when they closed. They refused to pay to have them picked up or shredded. Therefore compromising customer information and showing that they cared not for what was there. This can be proved by the issue list, they are blocking me from, that I will request in discovery as well as with sworn statements from 2 ex employees of that office.

Liberty is showing their desire to simply punish me financially anyway possible. They know of my disability and that my stroke was brought on in my office by stress caused by them..

Liberty knows that I am not an Attorney and can not afford one so they are, in my opinion, attempting to overwhelm me with legal paperwork in hopes that I will simply give up.

I responded to Liberty to remove the phrases that they were right and for them to contact me to make arrangements to get the files. Instead of contacting me, they choose to waste the courts time with this latest motion.

I ask the Court to please understand that I have willingly offered to give them what they want and that I simply do not agree to be intimidated into signing a document that says that they are right. Then have them turn around and use that document against me in a trial. I also agreed to provide them, the files, if they want to come and get them or if they prefer destroy them and provide proof. The burden and responsibility lies with plaintiffs to make arrangements to pick of the files or have them shipped at their expense if they want them. It is not the defendants responsibility to incur undue cost and labor to simply provide liberty tax files I willing agreed to give them, and as stated above to not have the finances or ability to do so.

Please excuse me, if the Court thinks I should not have so much mistrust for Liberty, but I have suffered 3 ½ years of lies and manipulations by Liberty which I plan to prove in court.

I ask the court to please consider the above statements as I swear them to be true and correct.

Respectfully submitted

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DEFENDANT PRO SE ON BEHALF OF
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